

AFFIDAVIT OF PATRICIA A. DEJUNEAS

I, Patricia A. DeJuneas, on oath depose and state as follows;

- 1.) I, along with Richard M. Egbert, represent Defendant, Francis White, in connection with the case pending in this Court. Mr. Egbert and I also represent Defendant, Frederick Simone, in a state court cases involving the same wiretaps at issue before this Court.
- 2.) During the course of representing Mr. Simone in the state court case, Mr. Egbert and I learned the following;
- 3.) Upon information and belief, federal authorities, assisted by the Massachusetts State Police, arrested Vincent Roberto in the State of Florida during the summer of 2000.
- 4.) Upon information and belief, during the summer of 2000, the government sought to seize much of Roberto's property and government agents threatened to press charges against Roberto's wife and daughter.
- 5.) Upon information and belief, the Florida prosecution was resolved, however, much to Roberto's favor: he paid a \$30,000 fine, the government abandoned its forfeiture requests and the government did not prosecute his family members.

SWORN TO UNDER THE PAINS AND PENALTIES OF PERJURY THIS 10TH
DAY OF SEPTEMBER, 2004.

/s/ Patricia A. DeJuneas